## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	)
Plaintiff,	)
v.	) No. 4:15 CR 00049 CDP/DDN
RAMIZ ZIJAD HODZIC,	)
a/k/a Siki Ramiz Hodzic,	)
SEDINA UNKIC HODZIC,	)
NIHAD ROSIC, a/k/a Yahya AbuAyesha Mudzahid,	) ) )
MEDIHA MEDY SALKICEVIC,	)
a/k/a Medy Ummuluna,	)
a/k/a Bosna Mexico, and	)
	)
ARMIN HARCEVIC	)
	)
Defendants.	)

## GOVERNMENT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE ITS RESPONSE TO THE DEFENDANT'S JOINT MOTION TO DISMISS THE INDICTMENT

Comes now the United States of America, by and through its attorneys, Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Howard Marcus, Matthew T. Drake and Kenneth Tihen, Assistant United States Attorneys for said District, Mara Kohn and Joshua Champaign, Trial Attorneys for the United States Department of Justice, National Security Division, Counterterrorism Section, and respectfully requests an extension of time to file the Government's response to the Defendant's Joint Motion to Dismiss the Indictment. In support, the Government states as follows:

The Government is requesting an extension of time until October 11, 2017, in which to file

its response to the Defendant's Joint Motion to Dismiss the Indictment. Attorneys for the Government have spoken to all the defense counsel in this matter and they do not object to the extension. Due to the nature of the facts and the type of charges in this case, there is a necessary level of review by the Department of Justice, of the Government's response, necessitating additional time.

WHEREFORE, the Government would respectfully request an extension of time until October 11, 2017 to file its response.

Respectfully Submitted,

CARRIE COSTANTIN
Acting United States Attorney

/s/ Howard Marcus

HOWARD MARCUS -Assistant United States Attorney

/s/ Matthew T. Drake

MATTHEW T. DRAKE – 46499MO Assistant United States Attorney

/s/ Mara M. Kohn

MARA M. KOHN, 2281SD Trial Attorney - NSD/Department of Justice Counterterrorism Section Mara.Kohn2@usdoj.gov

/s/ Joshua D. Champagne

JOSHUA D. CHAMPAGNE – 85743 VA, 1013246 DC Trial Attorney - NSD/Department of Justice Counterterrorism Section Joshua.Champagne@usdoj.gov

/s/ Kenneth R. Tihen

KENNETH R. R. TIHEN, 37325MO Assistant United States Attorney

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

/s/ Howard J, Marcus HOWARD J. MARCUS, 29756MO

Assistant United States Attorney